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Attorneys for Debtors and Reorganized Debtors

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**STIPULATION EXTENDING TIME FOR
CHUBB TO RESPOND TO
REORGANIZED DEBTORS' MOTION
TO APPROVE ADR AND RELATED
PROCEDURES FOR RESOLVING
GENERAL CLAIMS**

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is
2 entered into by PG&E Corporation and Pacific Gas and Electric Company (collectively, the
3 “**Debtors**” or “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter**
4 **11 Cases**”), and Chubb. The Reorganized Debtors and Chubb are referred to in this Stipulation
5 and Agreement for Order collectively as the “**Parties**,” and each as a “**Party**.” The Parties
6 hereby stipulate and agree as follows:

7 **RECITALS**

8 A. On September 1, 2020, the Reorganized Debtors filed a *Motion to Approve ADR*
9 *and Related Procedures for Resolving General Claims* [Dkt. No. 8970] (the “**Motion**”).

10 B. Any oppositions or responses to the Motion are due to be filed with the
11 Bankruptcy Court and served on counsel for the Reorganized Debtors by 4:00 p.m. (Pacific
12 Time) on September 15, 2020.

13 C. Counsel for Chubb has requested, and counsel for the Reorganized Debtors have
14 agreed, to extend the deadline for Chubb to file and serve any opposition or response to the
15 Motion to 4:00 p.m. (Pacific Time) on September 18, 2020.

16 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
17 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
18 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,
THAT:

19 1. The time for Chubb to file and serve any opposition or response to the Motion is
20 extended through 4:00 p.m. (Pacific Time) on September 18, 2020.

21 2. This Stipulation shall constitute the entire agreement and understanding of the
22 parties relating to the subject matter hereof and shall supersede all prior agreements and
23 understandings relating to the subject matter hereof.

24 3. This Stipulation may be executed in counterparts, each of which shall be deemed
25 an original but all of which together shall constitute one and the same agreement.

26 4. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or
27 controversies arising from this Stipulation.
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Dated: September 15, 2020
WEIL, GOTSHAL & MANGES LLP
KELLER BENVENUTTI KIM LLP

/s/ Tobias S. Keller
Tobias S. Keller

*Attorneys for Debtors
and Reorganized Debtors*

Dated: September 15, 2020
DUANE MORRIS LLP

/s/ Marcus O. Colabianchi
Marcus O. Colabianchi

Attorneys for Chubb